

EXHIBIT B



U.S. Department of Justice

*United States Attorney
Northern District of California*

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October 28, 2020

By E-mail to Defense Counsel

**Brian J. Beck
Zuber Lawler & Del Duca LLP
350 S. Grand Avenue, 32nd Fl.
Los Angeles, CA 90071, USA**

Re: United States v. Rowland Marcus Andrade, et al.
No. 20-CR-00249 RS

Dear Counsel:

Pursuant to your discovery requests and to Federal Rule of Criminal Procedure 16(a)(1)(B), the following Bates-numbered discovery and an index of the files will be produced for download by the defense via USAFX:

Beg. Bates	End Bates
FBI-302-000001	FBI-302-006077
FBI-ELA-2-000001	FBI-ELA-2-001266
FBI-MEDIA-000001	FBI-MEDIA-000070
FBI-UC-000001	FBI-UC-000102
IRS-DOCS-00000001	IRS-DOCS-00002924
IRS-GJ-0000001	IRS-GJ-0074737
IRS-MEMOS-00000001	IRS-MEMOS- 00000056

The government will make available for your inspection any item of evidence referred to in the enclosed reports and documents, as well as any other evidence seized from your client

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and/or which the government intends to offer in its case-in-chief. Please contact me to arrange a mutually convenient time for your inspection of such items.

The enclosed materials and any future discovery provided to you which may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law is provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations. We reject any suggestion that the criminal local rules, including Criminal Local Rule 16-1(c), serve as valid authority for any substantive discovery obligations beyond that required under the applicable federal statutes and rules (e.g., Rule 16 and Jencks).

Notice Re: FRE 404(b), 608, 609

The government also hereby gives notice that it may seek to introduce the other crimes, wrongs or acts committed by defendant which are referenced in the enclosed documents pursuant to Rules 404(b), 608 and/or 609 of the Federal Rules of Evidence.

Request for Reciprocal Discovery

With this letter the government requests all reciprocal discovery to which it is entitled under Federal Rules of Criminal Procedure 16(b) and (c) and 26.2, including, but not limited to, the following:

1. Inspection and/or copies of all books, papers, documents, photographs, tangible objects, or portions thereof in the possession, custody, or control of the defendant and which the defendant intends to introduce as evidence in his case-in-chief at trial.
2. Inspection and/or copies of the results of any reports of physical or mental examinations and of scientific tests or experiments made in connection with the above-entitled case within the possession or control of the defendant which the defendant intends to introduce as evidence in his case-in-chief at trial or which have been prepared by a witness whom the defendant intends to call at trial.
3. Inspection and/or copies of all statements made by all witnesses whom the defendant intends to call at trial.

Request for Notice of Defenses

The government also requests notice of any intention of your client to rely on an entrapment defense or a defense involving mental condition or duress, and/or an alibi defense for the charged offenses

Please contact us if you have any questions concerning the foregoing.

Very truly yours,

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DAVID L. ANDERSON
United States Attorney

/s/ Lloyd Farnham

LLOYD FARNHAM
ANDREW DAWSON
Assistant United States Attorneys

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